

may have misapprehended Applicant's previous comments and response. The portion of this sentence quoted in the final action appears to be taken out of context. The sentence reads "There is no insertion of any fake data or other insertion data to prevent interception of incoming data." (emphasis added). This language argued by Applicant is in the claims and is also added to claim 10 which subsequently has been allowed. Applicant has not argued features that are not in Applicant's claim but to the contrary specifically argued claim language that is actually in the claim.

For example, on page 12 of Applicant's previous response, Applicant specifically stated "For example, Applicant specifically claimed that the insertion data of the claimed invention is insertion data that prevents interception of incoming data but is inserted as part of incoming data. The received incoming data which contains actual data and the insertion data is filtered by comparing the stored provided insertion data with incoming data to determine which data is actual data." (pages 12 and 13). Claim 1 requires, among other things, "providing insertion data, to prevent interception of incoming data, for insertion as part of the incoming data". The Fadern reference does not contemplate the insertion of any such data that prevents interception of incoming data. In fact, the ID of the user as taught in Fadern is actual data, and not insertion data, since it is data that is actually needed by the system to operate. In fact, it does not appear that Fadern teaches the prevention of interception of any incoming data of any type. Accordingly, claims 1, 16 and 30 are in condition for allowance.

The Young reference is directed to a method and apparatus for verifying an individual's identity. The Young reference is directed to a method and device that verifies the identity of an individual based on keystroke dynamics. In other words, Young relies on experiments that have been done to show that the way an individual types tends to be as unique as a person's fingerprints. The Young reference describes a system that verifies an

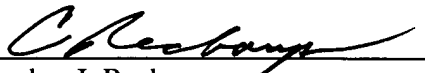
individual's identity based on the unique or distinctive typing patterns of an individual. There is no insertion of data that prevents interception of incoming data as claimed. In Young, an individual creates a template that may be, for example, a series of typed characters which are then compared at different times with keystrokes being entered by a current user. In each case, the keystrokes being entered are actual data that are intended to be used by the system. There is no insertion of any insertion data to prevent interception of incoming data. In fact, Young is not attempting to prevent interception of any incoming data but to the contrary, accepts all incoming data and then compares a sequence of typed characters with a stored template of typed characters to see if the system can determine if the distinctive typing pattern of an individual matches that of the template. There is no data that is inserted with actual data as required by the claims that is taught by any of the cited references. Accordingly, claims 1, 16 and 30 are in condition for allowance.

As to the dependent claims, Applicant respectfully reasserts the relevant remarks made in the previous response and again note that these claims add additional novel and non-obvious subject matter.

Accordingly, Applicant respectfully requests that a timely Notice of Allowance be issued in this case. The Examiner is invited to contact the below-listed attorney if the Examiner believes that a telephone conference will advance the prosecution of this application.

Respectfully submitted,

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